

SHER TREMONTE LLP

MEMO ENDORSED

October 21, 2020

VIA ECF

The Honorable Kenneth M. Karas
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: *United States v. Susan Klein 18 Crim. 614 (KMK)*

Dear Judge Karas:

I, together with Noam Biale, represent Susan Klein. We write to respectfully request, on behalf of all defendants, a brief adjournment of the deadline for defense sentencing submissions in this case. Defense submissions are currently due tomorrow, October 22. We request a five-day extension until Tuesday, October 27.

As Your Honor is aware, the parties set a universal briefing schedule to streamline the briefing in this case and allow the government to respond to all defense submissions at one time. Over the last two days, two parties have been granted or requested brief adjournments—one because of an illness in a lawyer's family, *see* Dkt. # 153 (granting a two-week adjournment to Moshe Schwartz), and one due to a death in one of the defendant's families. *See* Dkt. #154 (requesting, on behalf of Sholem Steinberg, a five-day adjournment).

Given these realities, we respectfully request a similar five-day adjournment of the submission deadline for the remaining defendants. This will bring all but one party back into briefing alignment. Also, given the other adjournments, it will not hinder the government or delay the ultimate resolution of this case. Finally, it will give counsel for the other defendants a few extra days to finalize their sentencing submissions, which several of the attorneys, including the undersigned, believe would be helpful both to the defendants and the Court.

We therefore respectfully request an adjournment of the defense sentencing submission deadline until October 27 and a similar extension of the government response deadline from November 12 to November 17. We have no objection if the government subsequently seeks a longer extension in order to respond to the defense submissions.

I have emailed the government to ascertain their position on this request, and attempted to reach them by phone, and have not yet heard back from them.

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We appreciate the Court's consideration.

Respectfully submitted,

/s/ Justine A. Harris

Justine A. Harris

cc: All Counsel (via ECF)

Granted.

So Ordered.



10/22/20